

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

MARCUS GRAY P/K/A FLAME; LECRAE
MOORE P/K/A LECRAE; EMANUEL
LAMBERT; and CHIKE OJUKWU,

Plaintiffs,

v.

KATY PERRY; JORDAN HOUSTON P/K/A
JUICY J; LUKASZ GOTTWALD P/K/A DR.
LUKE; SARAH THERESA HUDSON; MAX
MARTIN; HENRY RUSSELL WALTER
P/K/A CIRKUT; and CAPITOL RECORDS,
LLC,

Defendants.

Civil Action No. 4:14-CV-01183-HEA

**DEFENDANT LUKASZ GOTTWALD'S CROSS-MOTION TO SANCTION
PLAINTIFFS' COUNSEL FOR VEXATIOUS LITIGATION CONDUCT**

Pursuant to 28 U.S.C. § 1927 and the Court's inherent power, Defendant Lukasz Gottwald p/k/a Dr. Luke ("Gottwald") hereby moves this Court for an Order entering sanctions against Plaintiffs' counsel in the amount of the attorneys' fees and costs that Gottwald has incurred, and will incur, as a result of the filing of "Plaintiffs' Motion for Rule to Show Cause Why Defendant Lukasz Gottwald Should Not Be Held In Contempt" (Dkt. 52). A Memorandum of Law in support of this relief is being filed contemporaneously herewith.

DATED: November 13, 2014

Respectfully submitted,

MITCHELL SILBERBERG & KNUPP LLP

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Attorneys for Defendant
Lukasz Gottwald p/k/a Dr. Luke

CERTIFICATE OF SERVICE

I hereby certify that on this 13th day of November 2014, the foregoing document was filed electronically and served upon counsel of record via the court's ECF filing system.

/s/ Jeffrey M. Movit
Attorney for Defendant
Lukasz Gottwald p/k/a Dr. Luke